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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MICHAEL J. WELLS,
Plaintiff,

v.

ISABELLA CASILLAS GUZMAN,
Administrator of the U.S. SMALL
BUSINESS ADMINISTRATION, *et al.*,
Defendants.

Case No. 3:19-cv-00407-MMD-CLB

**Stipulation and Order for Extension
of Time
(First Request)**

Plaintiff, MICHAEL J. WELLS and Defendant ISABELLA CASILLAS GUZMAN, hereby stipulate and agree that Defendant may have a 30-day extension of time from May 20, 2022 to June 20, 2022, to file her reply to Plaintiff's Opposition to Defendant Guzman's Motion to Dismiss (ECF No. 53).

An extension is warranted for several reasons. First, defense counsel's office has lost a number of attorneys and staff. As a result, defense counsel is handling a higher-than-normal caseload. Second, only a limited number of attorneys and support staff may work in defense counsel's office at any given time due to the pandemic, thereby slowing the time it takes to process and complete required tasks. Third, defense counsel's calendar has been busier than normal with multiple filing deadlines in several cases, including one before the Ninth Circuit. Fourth, Plaintiff's opposition brief is 20 pages long and includes 75 pages of exhibits and will require more time than normal to meaningfully review. Fifth, defense

counsel stipulated to a 90-day extension of time for Plaintiff to file his opposition to Defendant's motion to dismiss; defense counsel has never opposed any extension request from Plaintiff or his counsel. Under the circumstances, good cause exists to extend the deadline for Defendant to file her reply to Plaintiff's Opposition to Defendant Guzman's Motion to Dismiss. *See* Fed. R. Civ. P. 6(b)(1)(A) ("When an act may or must be done within a specified time, the court may, *for good cause*, extend the time...with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires[.]") (emphasis added).

This is Defendant's first request for an extension of time. *See* LR IA 6-1(a) (must advise of previous extensions). Defense counsel contacted Plaintiff regarding this extension request, and he has advised that he does not oppose the request. This stipulation is made in good faith and not for the purpose of undue delay.

DATED: May 19, 2022


JASON M. FRIERSON
United States Attorney

/s/ Michael J. Wells
MICHAEL J. WELLS
Pro Se

/s/ Holly A. Vance
HOLLY A. VANCE
Assistant United States Attorney
Attorneys for Jovita Carranza

IT IS SO ORDERED.

DATED: June 3, 2022.


UNITED STATES DISTRICT JUDGE